

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

Caption in compliance with D.N.J. LBR 9004-1(b)

Nicholas Fitzgerald, Esq./NF6129  
Fitzgerald & Associates, Attorneys At Law  
649 Newark Avenue  
Jersey City, NJ 07306  
(201) 533-1100  
nickfitz.law@gmail.com

In Re:

Tamer Zakhary

Case No.: 23-19544

Hearing Date: 03/14/2024

Judge: SHERWOOD

**NOTICE OF CHAPTER 13 PLAN TRANSMITTAL**

The enclosed ☐ plan, ☒ modified plan is proposed by the debtor and was filed on January 23, 2024. It has been served on you because the plan contains motions that may adversely affect your interest.

Your rights may be affected by this plan. Your claim may be reduced, modified, or eliminated. This Plan may be confirmed and become binding, and included motions may be granted without further notice or hearing, unless written objection is filed before the deadline stated in the Notice. The Court may confirm this plan, if there are no timely filed objections, without further notice. See Bankruptcy Rule 3015. This plan includes motions to avoid or modify a lien, the lien avoidance or modification may take place solely within the chapter 13 confirmation process. The plan confirmation order alone will avoid or modify the lien. The debtor need not file a separate motion or adversary proceeding to avoid or modify a lien based on value of the collateral or to reduce the interest rate. An affected lien creditor who wishes to contest said treatment must file a timely objection and appear at the confirmation hearing to prosecute same.

**☒ Real Property:**

The debtor(s) has valued real property located at 110 Birch Street, Bloomfield, New Jersey 07003 [address] at \$ 624,800.00. The debtor(s) believes the first lien on the property to be in the approximate amount of \$ 647,737.94

[insert other liens as appropriate]. As such, the debtor(s) believes there is inadequate equity available to satisfy your lien and seeks through the plan to reduce, modify or eliminate your lien.

The debtor's valuation of the property is based on: (a) comparative market analysis; (b) broker price opinion; (c) appraisal; or (d) other: \_\_\_\_\_, a copy of which is attached. All forms of relief sought by motion appear in Part 7 of the plan.

☐ **Personal Property:**

The debtor(s) has valued personal property described as: \_\_\_\_\_ at \$ \_\_\_\_\_.

The debtor(s) believes the lien on the property to be in the approximate amount of \$ \_\_\_\_\_.  
[insert other liens as appropriate]. As such, the debtor(s) believes there is inadequate equity available to satisfy your lien and seeks through the plan to reduce, modify or eliminate your lien.

The debtor's valuation of the property is based on: (a) broker price opinion; (b) appraisal; or (c) other: \_\_\_\_\_, a copy of which is attached. All forms of relief sought by motion appear in Part 7 of the plan.

The Confirmation Hearing is scheduled for March 14, 2023.

Objections to any relief sought in the plan, including relief sought by motion, must be filed with the Clerk of the Bankruptcy Court no later than 7 days prior to the confirmation hearing.

YOU SHOULD CONSULT WITH AN ATTORNEY PROMPTLY, SINCE ENTRY OF AN ORDER OF CONFIRMATION WILL BIND YOU TO ALL OF THE TERMS OF THE CONFIRMED PLAN.